Message

From: Cirian, Mike [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=98D0FD2CBB3F4F25B819C6929E18D08D-CIRIAN, MIKE]

Sent: 5/22/2018 3:32:23 PM

To: Emilsson, Gunnar [EmilssonGR@cdmsmith.com]

Subject: RE: Draft response to Nino Berube

Thanks Gunnar, This looks fine. I will send this to Nino and copy our congressionals since he handed them each a copy of his letter. This helps having you draft this up as I have a shorter attention span with Nino as he keeps repeating things and I just want to write "Asked and answered"

Mike

Mike Cirian, PE Libby On-site Project Manager US EPA 108 East 9th Street Libby, MT 59923 (406) 293-6194 Office

From: Emilsson, Gunnar [mailto:EmilssonGR@cdmsmith.com]

Sent: Tuesday, May 22, 2018 9:26 AM **To:** Cirian, Mike <Cirian.Mike@epa.gov> **Subject:** Draft response to Nino Berube

Mike:

Take a look at the draft response below. Let me know if you would like for me to expand it. I'm inclined to advise you not to send the Roux response as it might just rile him up more.

Gunnar

P.S. I will email Mike Ritorto and ask that CFAC post the final documents reference below on their website.

Nino:

Thank you for your April 29, 2018 comments on the final February 2017 Phase I Site Characterization Data Summary Report. EPA values public input at all stages of the CERCLA process. We have reviewed your comments with Montana DEQ and CFAC, and CFAC has prepared a point-by-point response. I will summarize below the results of our consideration of your comments.

- Much work has occurred on site since the February 2017 report was issued. All four rounds of ground water and surface water sampling results have been summarized in the March 2018 Groundwater and Surface Water Summary Report. A copy of that report should be available shortly at the www.cfacproject.com website.
- Our evaluation of the Phase I data has resulted in the May 2018 Phase II Site Characterization Sampling and Analysis Plan, which we approved last week. This work, which began this month and will continue until this fall, includes the installation of eight monitoring wells (including five west of the plant and east of Aluminum City), collection of 444 soil samples, two rounds of surface water sampling at existing and new stations, two rounds of ground water sampling (including the five former production wells you requested in your comments), and

- additional background investigations for soil, sediment, and surface water. We believe that this additional work will address many of the questions you raised in your comments. The May 2018 Phase II Site Characterization Sampling and Analysis Plan should also be available shortly at the www.cfacproject.com website.
- We are currently in the remedial investigation phase of the remedial investigation/feasibility study (RI/FS) process. The objectives of the RI are to determine the fate and transport of contaminants released to the environment (soil, sediments, groundwater and surface water), and the nature and extent of contamination. Several of your comments question why we aren't investigating buried wastes and liner integrity. These may be studied in the future under the FS phase when options to control sources of contamination that pose a threat to human health and the environment are evaluated.

I trust that a lot of your questions will be answered when you review the Phase II Site Characterization Sampling and Analysis Plan. We value your input, and believe the current investigations will contribute to our understanding of the nature and extent of contamination at the CFAC site.

Sincerely,

Mike Crian, PE Remedial Project Manager US EPA Region 8